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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. **2011-789**

13 **SHAKEEL SHIU PRASAD, AKA**
14 **SHAKEEL SHIN PRASAD**
15 **725 Milbank Drive**
16 **Modesto, CA 95357**

A C C U S A T I O N

17 **Registered Nurse License No. 765378**

18 Respondent.

19 Complainant alleges:

PARTIES

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

Registered Nurse License

23 2. On or about January 14, 2010, the Board issued Registered Nurse License Number
24 765378 to Shakeel Shiu Prasad, also known as Shakeel Shin Prasad ("Respondent"). The
25 registered nurse license was in full force and effect at all times relevant to the charges brought
26 herein and will expire on February 28, 2013, unless renewed.
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1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Criminal Conviction)**

5 8. Respondent has subjected his license to discipline pursuant to Code section 2761,
6 subdivision (f), in that on or about July 6, 2010, in the Superior Court, County of Stanislaus,
7 California, in the matter entitled *People vs. Shakeel Shiu Prasad*, 2010, Case No. 1419065,
8 Respondent was convicted following his plea of nolo contendere to a violation of Vehicle Code
9 section 23152, subdivision (b) (driving while having a blood alcohol of .08% or higher), a
10 misdemeanor. The circumstances of the crime are that on or about April 13, 2010, Respondent
11 was arrested by the Modesto Police following a traffic stop for driving with a blood alcohol level
12 of .08% or more. Respondent's blood alcohol level measured .22%. Such conduct is
13 substantially related to the qualifications, functions, and duties of a licensed registered nurse.

14 **SECOND CAUSE FOR DISCIPLINE**

15 **(Conviction of a Crime Involving Alcohol)**

16 9. Respondent has subjected his license to discipline pursuant to Code section 2761,
17 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,
18 subdivision (c), in that Respondent has been convicted of a crime involving the consumption of
19 alcohol, as more particularly set forth in paragraph 8, above.

20 **THIRD CAUSE FOR DISCIPLINE**

21 **(Use Alcohol to an Extent or in a Manner Dangerous or Injurious)**

22 10. Respondent has subjected his license to discipline pursuant to Code section 2761,
23 subdivision (a), on the grounds of unprofessional conduct, as defined in Code section 2762,
24 subdivision (b), in that on or about April 13, 2010, Respondent used alcohol to an extent or in a
25 manner dangerous or injurious to himself or others, as more particularly set forth in paragraphs 8,
26 above.

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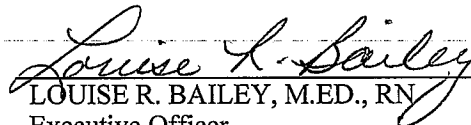
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 765378, issued to Shakeel Shiu Prasad, also known as Shakeel Shin Prasad;
2. Ordering Shakeel Shiu Prasad, also known as Shakeel Shin Prasad to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,
3. Taking such other and further action as deemed necessary and proper.

DATED: 3/18/11


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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